

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc., *et al.*<sup>1</sup>

The Debtors.

Chapter 11

Bankr. Case No. 23-10763 (AMC)  
(Jointly Administered)

**DECLARATION OF JOHN H. THOMPSON**

I, John H. Thompson, pursuant to 28 U.S.C § 1746, hereby declare under penalty of perjury under the laws of the United States of America:

1. I respectfully submit this declaration in support of *Visual Semiconductor, Inc.*’s *Objection to Motion for (I) an Order (A) Approving Bidding Procedures and Form Asset Purchase Agreement for the Sale of Substantially all of the Debtor’s Assets Including Approval of the Provisions for Designation of a Stalking Horse, (B) Establishing the Notice Procedures and Approving the Form and Manner of Notice Thereof and scheduling and Auction, (C) Approving Procedures for Assumption and Assignment of Certain Executory Contracts and Unexpired Leases (D) Scheduling a Sale Hearing, and (E) Granting Expedited Consideration Pursuant to Local Rule of Bankruptcy Procedure 5070-1(g); and (F) Granting Related Relief and (II) an Order Approving (A) the Sale of the Debtors Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto and (C) Granting Related Relief (the "Objection")*. Other than as set forth expressly herein, this declaration is based upon personal knowledge.

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<sup>1</sup> The Debtors, together with the last four digits of the Debtors’ federal tax identification numbers, are Stream TV Networks, Inc. v. SeeCubic, Inc., No. 360, 2021 (Del. June 15, 2022) (the “Supreme Court Decision”) Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors’ service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

2. Attached as Exhibits 1-10 are true and correct copies of email communications

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 6, 2024

By:

DocuSigned by:  
  
DED51BFAEBCB492...

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John H. Thompson

## Certificate Of Completion

Envelope Id: B394DC3971C1406C965DBC7D3A8A66C1	Status: Completed
Subject: Complete with DocuSign: Declaration of John Thompson.pdf	
Source Envelope:	
Document Pages: 2	Signatures: 1
Certificate Pages: 2	Initials: 0
AutoNav: Enabled	Envelope Originator:
Enveloped Stamping: Enabled	Valerie Braun
Time Zone: (UTC-05:00) Eastern Time (US & Canada)	495 N Keller Rd Ste 300
	Maitland, 32751-8656
	valerie.braun@akerman.com
	IP Address: 104.182.26.121

## Record Tracking

Status: Original	Holder: Valerie Braun	Location: DocuSign
11/6/2024 12:25:45 PM	valerie.braun@akerman.com	

## Signer Events

Signature	Timestamp
<p>John H Thompson</p> <p>John.Thompson@akerman.com</p> <p>Assistant Treasurer</p> <p>Security Level: Email, Account Authentication (None)</p>	<p>Sent: 11/6/2024 12:27:12 PM</p> <p>Viewed: 11/6/2024 12:37:29 PM</p> <p>Signed: 11/6/2024 12:38:23 PM</p>
<p>DocuSigned by:</p>  <p>DED61BFAEBCB492...</p> <p>Signature Adoption: Pre-selected Style</p> <p>Using IP Address: 204.9.58.194</p>	

**Electronic Record and Signature Disclosure:**  
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## In Person Signer Events

Signature	Timestamp
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## Editor Delivery Events

Status	Timestamp
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## Agent Delivery Events

Status	Timestamp
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## Intermediary Delivery Events

Status	Timestamp
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## Certified Delivery Events

Status	Timestamp
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## Carbon Copy Events

Status	Timestamp
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<p>Teresa Barrera</p> <p>teresa.barrera@akerman.com</p> <p>Security Level: Email, Account Authentication (None)</p>	<div style="border: 2px solid blue; padding: 5px; text-align: center; font-weight: bold; font-size: 1.2em;">COPIED</div>	<p>Sent: 11/6/2024 12:27:13 PM</p> <p>Viewed: 11/6/2024 12:27:50 PM</p>
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**Electronic Record and Signature Disclosure:**  
Not Offered via DocuSign

<p>Valerie Braun</p> <p>valerie.braun@akerman.com</p> <p>Akerman LLP</p> <p>Security Level: Email, Account Authentication (None)</p>	<div style="border: 2px solid blue; padding: 5px; text-align: center; font-weight: bold; font-size: 1.2em;">COPIED</div>	<p>Sent: 11/6/2024 12:27:14 PM</p> <p>Resent: 11/6/2024 12:38:26 PM</p> <p>Viewed: 11/6/2024 12:43:53 PM</p>
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**Electronic Record and Signature Disclosure:**  
Not Offered via DocuSign

## Witness Events

Signature	Timestamp
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## Notary Events

Signature	Timestamp
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## Envelope Summary Events

Status	Timestamps
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Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	11/6/2024 12:27:14 PM
Certified Delivered	Security Checked	11/6/2024 12:37:29 PM
Signing Complete	Security Checked	11/6/2024 12:38:23 PM
Completed	Security Checked	11/6/2024 12:38:23 PM
Payment Events	Status	Timestamps

**From:** Vagnoni, Michael <Michael.vagnoni@obermayer.com>  
**Sent:** Monday, July 29, 2024 2:13 PM  
**To:** Thompson, John (Ptnr-DC); George, Edmond  
**Cc:** SCarroll@manatt.com; RHartunian@manatt.com; Swick, Adam (Aus)  
**Subject:** RE: StreamTV - Proof of funds from VSI

**[External to Akerman]**

John:

We have reviewed the Expression of Interest and bank statement you forwarded late last week. We are happy to schedule another call, however, before we do, we need to see the diligence request from ULAS and we need to know if your client intends to make a qualified bid and participate in the auction of the assets or if you have some alternative plan – if that is the case we need to see the structure and details of that plan.

In light of our discussion about adjourning and consolidating the current hearing dates as well as the associated discovery and briefing, we contacted Judge Chan's courtroom deputy and there may be dates open in mid-September and there are available dates in early October. I will find out actual dates and let you know what they are. On your notice of deposition, the Trustee is not available on August 9 and considering that we are adjourning the hearings, we will look at dates later August and let you know his availability.

Michael



**Michael D. Vagnoni**

Partner

**Obermayer Rebmann Maxwell & Hippel LLP**

Centre Square West

1500 Market Street | Suite 3400

Philadelphia, PA 19102-2101

215.665.3066 tel | 215.665.3165 fax

[michael.vagnoni@obermayer.com](mailto:michael.vagnoni@obermayer.com) | [www.obermayer.com](http://www.obermayer.com)



**From:** john.thompson@akerman.com <john.thompson@akerman.com>

**Sent:** Monday, July 29, 2024 12:33 PM

**To:** Vagnoni, Michael <Michael.vagnoni@obermayer.com>; George, Edmond <Edmond.George@obermayer.com>

Cc: SCarroll@manatt.com; RHartunian@manatt.com; adam.swick@akerman.com

Subject: RE: StreamTV - Proof of funds from VSI

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Michael and Ed:

I'm just following up on my email from last Thursday in the hope that we can get a response from you and the Trustee regarding our request for a call and a pathway for managing the due diligence items highlighted below. Given the outstanding motions practice, discovery requests, and associated calendar we would appreciate the Trustee's response as soon possible.

Many thanks,  
John

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

## Profile



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---

**From:** Thompson, John (Ptnr-DC)

**Sent:** Thursday, July 25, 2024 5:41 PM

**To:** 'Vagnoni, Michael' <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>; 'George, Edmond' <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>

**Cc:** 'SCarroll@manatt.com' <[SCarroll@manatt.com](mailto:SCarroll@manatt.com)>; 'RHartunian@manatt.com' <[RHartunian@manatt.com](mailto:RHartunian@manatt.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>

**Subject:** StreamTV - Proof of funds from VSI

Michael and Ed:

Thanks again for our conference call earlier this week. As promised, attached is the proof of funds from VSI's investment partner, and I have copied the investor's counsel here as well. Because the investor seeks certain due diligence materials that are only within the custody, possession, or control of the Trustee, we would respectfully request that you and the Trustee help facilitate the diligence requests from Mr. Carroll and Mr. Hartanian on behalf of their client. In light of the foregoing, please let us know when we can schedule a call early next week to coordinate a path forward.

Finally, consistent with our discussion this week, we are going to notice the Trustee's deposition. However, in light of the enclosed proof of funds and our shared opinion that it doesn't make sense to litigate these issues if we are going to reach a deal, we should discuss adjourning and consolidating the current hearing dates as well as the associated discovery and briefing. Please confirm that you are in agreement, advise as to the alternative dates you have received from the Bankruptcy Court, and propose some dates and times for a call early next week.

Best regards,  
John

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

---

**From:** Thompson, John (Ptrn-DC)  
**Sent:** Friday, August 2, 2024 12:04 PM  
**To:** Vagnoni, Michael; George, Edmond  
**Cc:** SCarroll@manatt.com; RHartunian@manatt.com; Swick, Adam (Aus)  
**Subject:** RE: StreamTV - Proof of funds from VSI

Michael:

Apologies for the delayed response. I wanted to get clarity with respect to the diligence needs before following up. An outline of the due diligence requests of the Trustee with respect to the Debtors' estate is below, but let me address your other questions and points about scheduling first.

At this juncture, I cannot tell you whether we will be offering a qualified bid for the assets in a 363 sale or an alternative plan, as that determination is dependent upon the successful completion of the due diligence and an exploration of options with the Trustee. What I can assure you is that any proposal we do make will result in a materially better outcome for all interested parties (and particularly unsecured creditors) than the current bid offered by Hawk & SLS and reflected in your 9019 Settlement with those parties. After we have had an opportunity to complete the diligence, we will provide a term sheet outlining our proposal(s) for a path forward.

With respect to the motions practice, hearing dates, and pending discovery, I believe we have adjourned those matters to October 4 to provide us some time to reach agreement on a more comprehensive deal and obviate the need for any continued litigation. To that end, we would agree with you that it makes sense to adjourn the Trustee's deposition to a later date (late August or sometime in September).

Finally, here are the due diligence requirements:

1. A current list of patents owned by Ultra-D Cooperatief on behalf of the Stream group. (Note that the most recent list was provided in December 2022 and is now a year and a half old).
2. The Trustee will need to facilitate technical calls with the Netherlands engineers at SeeCubic B.V. next week.

Obviously, the single most important aspect of any potential deal for VSI/ULAS is the confirmation of Stream's IP assets (i.e. ownership, control, viability, value, etc). Accordingly, we would appreciate the Trustee's full cooperation in helping our clients obtain this critical information through the due diligence process.

Thank you,  
John

**John Thompson**

Partner  
Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001  
D: 202 824 1760 | C: 202 302 0646  
[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

---

**From:** Vagnoni, Michael <Michael.vagnoni@obermayer.com>  
**Sent:** Monday, July 29, 2024 3:13 PM  
**To:** Thompson, John (Ptrn-DC) <john.thompson@akerman.com>; George, Edmond <Edmond.George@obermayer.com>



Cc: SCarroll@manatt.com; RHartunian@manatt.com; Swick, Adam (Aus) <adam.swick@akerman.com>

Subject: RE: StreamTV - Proof of funds from VSI

**[External to Akerman]**

John:

We have reviewed the Expression of Interest and bank statement you forwarded late last week. We are happy to schedule another call, however, before we do, we need to see the diligence request from ULAS and we need to know if your client intends to make a qualified bid and participate in the auction of the assets or if you have some alternative plan – if that is the case we need to see the structure and details of that plan.

In light of our discussion about adjourning and consolidating the current hearing dates as well as the associated discovery and briefing, we contacted Judge Chan's courtroom deputy and there may be dates open in mid-September and there are available dates in early October. I will find out actual dates and let you know what they are. On your notice of deposition, the Trustee is not available on August 9 and considering that we are adjourning the hearings, we will look at dates later August and let you know his availability.

Michael



**Michael D. Vagnoni**

Partner

**Obermayer Rebmann Maxwell & Hippel LLP**

Centre Square West

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Philadelphia, PA 19102-2101

215.665.3066 tel | 215.665.3165 fax

[michael.vagnoni@obermayer.com](mailto:michael.vagnoni@obermayer.com) | [www.obermayer.com](http://www.obermayer.com)



**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Sent:** Monday, July 29, 2024 12:33 PM

**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>; George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>

**Cc:** [SCarroll@manatt.com](mailto:SCarroll@manatt.com); [RHartunian@manatt.com](mailto:RHartunian@manatt.com); [adam.swick@akerman.com](mailto:adam.swick@akerman.com)

**Subject:** RE: StreamTV - Proof of funds from VSI

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Michael and Ed:

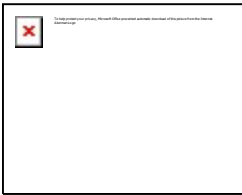
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Many thanks,  
John

**John Thompson**

Partner  
Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001  
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**Profile**



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---

**From:** Thompson, John (Ptnr-DC)  
**Sent:** Thursday, July 25, 2024 5:41 PM  
**To:** 'Vagnoni, Michael' <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>; 'George, Edmond' <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>  
**Cc:** 'SCarroll@manatt.com' <[SCarroll@manatt.com](mailto:SCarroll@manatt.com)>; 'RHartunian@manatt.com' <[RHartunian@manatt.com](mailto:RHartunian@manatt.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>  
**Subject:** StreamTV - Proof of funds from VSI

Michael and Ed:

Thanks again for our conference call earlier this week. As promised, attached is the proof of funds from VSI's investment partner, and I have copied the investor's counsel here as well. Because the investor seeks certain due diligence materials that are only within the custody, possession, or control of the Trustee, we would respectfully request that you and the Trustee help facilitate the diligence requests from Mr. Carroll and Mr. Hartanian on behalf of their client. In light of the foregoing, please let us know when we can schedule a call early next week to coordinate a path forward.

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Best regards,  
John

**John Thompson**

Partner

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D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

---

**From:** Vagnoni, Michael <Michael.vagnoni@obermayer.com>  
**Sent:** Monday, August 12, 2024 7:30 AM  
**To:** Thompson, John (Ptnr-DC)  
**Cc:** George, Edmond; Swick, Adam (Aus); Saldutti, William  
**Subject:** RE: Stream

**[External to Akerman]**

We are working on your requests and setting up a meeting with the engineers in the Netherlands. Please let me know your availability this week. I have limited availability tomorrow and an all-day hearing on Wednesday, but Thursday and Friday are generally free.

Do you have a copy of the NDA between VSI and the Trustee? We are also going to need an NDA with ULAS. The expression of interest you sent also mentions a family office called Continental Advisory Services, LLC – are you aware if that company will be receiving the diligence as well – if so, we will need an NDA for them as well.

Michael



**Michael D. Vagnoni**  
Partner

**Obermayer Rebmann Maxwell & Hippel LLP**  
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Philadelphia, PA 19102-2101  
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[michael.vagnoni@obermayer.com](mailto:michael.vagnoni@obermayer.com) | [www.obermayer.com](http://www.obermayer.com)



---

**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Sent:** Friday, August 9, 2024 10:59 AM  
**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; [adam.swick@akerman.com](mailto:adam.swick@akerman.com)  
**Subject:** Re: Stream

Michael,

I was looking for your email from yesterday afternoon regarding the due diligence follow ups on the IP licenses and calls, however, I didn't see one. Please let me know if I missed something you sent. My understanding was that you were to have a conversation with the engineers in the Netherlands to coordinate. Please let me know when we can expect to receive the updated IP listing and we can schedule the calls the engineers. We really need to get moving on this.

Thanks,  
John

On Aug 6, 2024, at 5:00 PM, Thompson, John (Ptrn-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)> wrote:

Michael:

We'd really like to get started with the very limited diligence we requested of the Trustee and to transition needto negotiations to achieve a consensual path forward as quickly as possible. So we would appreciate the Trustee's responses to/facilitation of the two diligence requests sometime this evening or tomorrow morning, and we are fully available for a call with you anytime tomorrow. If tomorrow afternoon is the soonest that you can do a call, please name the time, and we will set it up and circulate the meeting link.

Thanks,  
John

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

---

**From:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Sent:** Tuesday, August 6, 2024 4:44 PM

**To:** Thompson, John (Ptrn-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>

**Subject:** RE: Stream

**[External to Akerman]**

John – we are caught up in a bit of a mess – tomorrow is going to be much better for a call – what is your availability in the afternoon?



**Michael D. Vagnoni**

Partner

**Obermayer Rebmann Maxwell & Hippel LLP**

Centre Square West

1500 Market Street | Suite 3400

Philadelphia, PA 19102-2101

215.665.3066 tel | 215.665.3165 fax

[michael.vagnoni@obermayer.com](mailto:michael.vagnoni@obermayer.com) | [www.obermayer.com](http://www.obermayer.com)



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**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Sent:** Tuesday, August 6, 2024 1:50 PM  
**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; [adam.swick@akerman.com](mailto:adam.swick@akerman.com)  
**Subject:** RE: Stream

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Michael:

Just confirming that you received this and that we can speak this afternoon. We are available now and through the rest of the day.

Thanks,  
JT

**John Thompson**

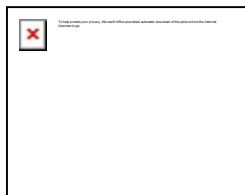
Partner

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[Profile](#)



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**To:** 'Vagnoni, Michael' <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

Cc: George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus)

<[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>

**Subject:** RE: Stream

Michael:

Thanks for your email. Yes, we have a number of items to address, so a call this afternoon would be very helpful. We are available anytime between 1 pm - 5 pm ET. Let us know what works for you, and we will circulate a meeting invite and link.

Thanks,  
JT

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

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**From:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Sent:** Tuesday, August 6, 2024 10:45 AM

**To:** Thompson, John (Ptrn-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>

**Subject:** Stream

**[External to Akerman]**

John: I got your voice mail from yesterday afternoon – I am in the middle of a hearing. Is there anything specific you need to discuss or a specific time that is good for a call this afternoon? Michael



**Michael D. Vagnoni**

Partner

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**Sent:** Monday, August 12, 2024 11:41 AM  
**To:** Vagnoni, Michael  
**Cc:** George, Edmond; Swick, Adam (Aus); Saldutti, William; Espinosa, Eduardo (Ptrn-Dal)  
**Subject:** RE: Stream

Michael,

We are available this afternoon and all day tomorrow at your convenience. Please let us know what time you can speak.

Yes, we have a copy of the NDA between VSI and the Trustee. We will share confidential information with ULAS only pursuant to Section 2.2 of the NDA. Finally, Continental Advisory Services, LLC will not be receiving confidential information. If such disclosure becomes necessary, we will contact you for your permission to disclose such confidential information in advance.

Thanks,  
John

**John Thompson**

Partner  
Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001  
D: 202 824 1760 | C: 202 302 0646  
[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

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**From:** Vagnoni, Michael <Michael.vagnoni@obermayer.com>  
**Sent:** Monday, August 12, 2024 8:30 AM  
**To:** Thompson, John (Ptrn-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>; Saldutti, William <[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>  
**Subject:** RE: Stream

**[External to Akerman]**

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Michael



**Michael D. Vagnoni**

Partner

**Obermayer Rebmann Maxwell & Hippel LLP**

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215.665.3066 tel | 215.665.3165 fax

[michael.vagnoni@obermayer.com](mailto:michael.vagnoni@obermayer.com) | [www.obermayer.com](http://www.obermayer.com)



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**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Sent:** Friday, August 9, 2024 10:59 AM  
**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
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Yes, we have a copy of the NDA between VSI and the Trustee. We will share confidential information with ULAS only pursuant to Section 2.2 of the NDA. Finally, Continental Advisory Services, LLC will not be receiving confidential information. If such disclosure becomes necessary, we will contact you for your permission to disclose such confidential information in advance.

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**Sent:** Tuesday, August 13, 2024 4:12 PM  
**To:** George, Edmond; Vagnoni, Michael  
**Cc:** Swick, Adam (Aus); Saldutti, William; Espinosa, Eduardo (Ptrn-Dal)  
**Subject:** RE: Stream  
**Attachments:** VSI-Stream Binding Term sheet.docx

Ed:

As we have made clear in multiple communications, we are working diligently to provide the Trustee with an actionable proposal that is unequivocally better than what is currently on the table from Hawk/SLS/SCI and time is of the essence. So, as Michael requested during our call on Aug. 7, our Client provided the Trustee with a formal offer. I'm sure you didn't mean to suggest that you wouldn't entertain a superior offer merely because you don't like the file format in which it was delivered. The content of the offer is the same in Word and PDF. In the interest of expediency, attached is a Word version of the offer. We are prepared to entertain reasonable modifications. Please provide them, if any, promptly. And just to be clear, you can download a pdf version from DocuSign. It's a button at the top.

Finally, please advise as to when you will be available for the call promised by Michael below.

Thank you,  
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John, we got a term sheet by Docusign. The Trustee isn't signing anything until he can digest the terms of this proposal, and determine if it presents something better than what is on the table. So we are clear, we are not reviewing a Docusign document. Please send a word version of this Document as we don't want any confusion about what is happening here. If you want proof we received it, send it with a return receipt. Not sure why you used Docusign.

Best

Ed.

---

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**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>

**Subject:** RE: Stream

**[External to Akerman]**

John – we are caught up in a bit of a mess – tomorrow is going to be much better for a call – what is your availability in the afternoon?



**Michael D. Vagnoni**

Partner

**Obermayer Rebmann Maxwell & Hippel LLP**

Centre Square West

1500 Market Street | Suite 3400

Philadelphia, PA 19102-2101

215.665.3066 tel | 215.665.3165 fax

[michael.vagnoni@obermayer.com](mailto:michael.vagnoni@obermayer.com) | [www.obermayer.com](http://www.obermayer.com)



**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Sent:** Tuesday, August 6, 2024 1:50 PM  
**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; [adam.swick@akerman.com](mailto:adam.swick@akerman.com)  
**Subject:** RE: Stream

**WARNING:** This email originated from an external sender. Exercise caution before clicking links or opening attachments. When in doubt, contact the IT department.

Michael:

Just confirming that you received this and that we can speak this afternoon. We are available now and through the rest of the day.

Thanks,  
JT

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

**Profile**



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**From:** Thompson, John (Ptnr-DC)  
**Sent:** Tuesday, August 6, 2024 11:13 AM  
**To:** 'Vagnoni, Michael' <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>  
**Subject:** RE: Stream

Michael:

Thanks for your email. Yes, we have a number of items to address, so a call this afternoon would be very helpful. We are available anytime between 1 pm - 5 pm ET. Let us know what works for you, and we will circulate a meeting invite and link.

Thanks,  
JT

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D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

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**From:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Sent:** Tuesday, August 6, 2024 10:45 AM

**To:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>

**Subject:** Stream

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Partner

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**From:** Thompson, John (Ptrn-DC)  
**Sent:** Wednesday, August 14, 2024 6:02 PM  
**To:** Vagnoni, Michael; George, Edmond  
**Cc:** Swick, Adam (Aus); Saldutti, William; Espinosa, Eduardo (Ptrn-Dal)  
**Subject:** Re: Stream  
**Attachments:** image001.jpg; image002.jpg; image003.jpg; image004.jpg; image005.png; image001.jpg; image002.jpg; image003.jpg; image004.jpg; image005.png; image001.jpg; image002.jpg; image003.jpg; image004.jpg; image005.png; image001.jpg; VSI-Stream Binding Term sheet.docx; image002.jpg; image005.png; image003.jpg; image004.jpg

Michael:

I appreciate that you have been in a hearing all day today, but we communicated our availability for a call on Monday and Tuesday and received no response. We further communicated VSI's term sheet to provide a substantial cash facility and sponsor a plan of reorganization with a renewed request for a time to complete a call and advance the due diligence request - no answer. I don't think it is unreasonable for us to conclude that the Trustee is ignoring and/or slow-walking our reasonable requests. Please advise as to whether and when the Trustee will engage with VSI and when we can have a call. If we do not hear back promptly, we will have to conclude that the Trustee is uninterested in entertaining reasonable proposals and consider VSI's alternatives.

Thank you,  
John

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On Aug 13, 2024, at 5:12 PM, Thompson, John (Ptrn-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)> wrote:

Ed:

As we have made clear in multiple communications, we are working diligently to provide the Trustee with an actionable proposal that is unequivocally better than what is currently on the table from Hawk/SLS/SCI and time is of the essence. So, as Michael requested during our call on Aug. 7, our Client provided the Trustee with a formal offer. I'm sure you didn't mean to suggest that you wouldn't entertain a superior offer merely because you don't like the file format in which it was delivered. The content of the offer is the same in Word and PDF. In the interest of expediency, attached is a Word version of the offer. We are prepared to entertain reasonable modifications. Please provide them, if any, promptly. And just to be clear, you can download a pdf version from DocuSign. It's a button at the top.

Finally, please advise as to when you will be available for the call promised by Michael below.

Thank you,  
John

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**From:** George, Edmond <Edmond.George@obermayer.com>

**Sent:** Tuesday, August 13, 2024 3:52 PM

**To:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>; Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Cc:** Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>; Saldutti, William <[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>; Espinosa, Eduardo (Ptnr-Dal) <[eduardo.espinosa@akerman.com](mailto:eduardo.espinosa@akerman.com)>

**Subject:** RE: Stream

**[External to Akerman]**

John, we got a term sheet by Docusign. The Trustee isn't signing anything until he can digest the terms of this proposal, and determine if it presents something better than what is on the table. So we are clear, we are not reviewing a Docusign document. Please send a word version of this Document as we don't want any confusion about what is happening here. If you want proof we received it, send it with a return receipt. Not sure why you used Docusign.

Best

Ed.

---

**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Sent:** Monday, August 12, 2024 5:13 PM

**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; [adam.swick@akerman.com](mailto:adam.swick@akerman.com); Saldutti, William <[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>; [eduardo.espinosa@akerman.com](mailto:eduardo.espinosa@akerman.com)

**Subject:** RE: Stream

Michael:

If you have not seen it already, you should have received a copy of VSI's term sheet outlining its proposal to serve as plan sponsor to provide a \$115 million facility for the reorganization of the StreamTV debtors (sent via DocuSign from my partner Eduardo Espinosa). We look forward to the Trustee's prompt response as well as a follow up from you regarding a time for tomorrow's call.

Thank you,  
John

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

**From:** Thompson, John (Ptnr-DC)  
**Sent:** Monday, August 12, 2024 12:41 PM  
**To:** 'Vagnoni, Michael' <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>; Saldutti, William <[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>; Espinosa, Eduardo (Ptnr-Dal) <[eduardo.espinosa@akerman.com](mailto:eduardo.espinosa@akerman.com)>  
**Subject:** RE: Stream

Michael,

We are available this afternoon and all day tomorrow at your convenience. Please let us know what time you can speak.

Yes, we have a copy of the NDA between VSI and the Trustee. We will share confidential information with ULAS only pursuant to Section 2.2 of the NDA. Finally, Continental Advisory Services, LLC will not be receiving confidential information. If such disclosure becomes necessary, we will contact you for your permission to disclose such confidential information in advance.

Thanks,  
John

**John Thompson**  
Partner  
Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001  
D: 202 824 1760 | C: 202 302 0646  
[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

---

**From:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
**Sent:** Monday, August 12, 2024 8:30 AM  
**To:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>; Saldutti, William <[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>  
**Subject:** RE: Stream

**[External to Akerman]**

We are working on your requests and setting up a meeting with the engineers in the Netherlands. Please let me know your availability this week. I have limited availability tomorrow and an all-day hearing on Wednesday, but Thursday and Friday are generally free.

Do you have a copy of the NDA between VSI and the Trustee? We are also going to need an NDA with ULAS. The expression of interest you sent also mentions a family office called Continental Advisory Services, LLC – are you aware if that company will be receiving the diligence as well – if so, we will need an NDA for them as well.

Michael

**Michael D. Vagnoni**

Partner

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**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Sent:** Friday, August 9, 2024 10:59 AM

**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; [adam.swick@akerman.com](mailto:adam.swick@akerman.com)

**Subject:** Re: Stream

Michael,

I was looking for your email from yesterday afternoon regarding the due diligence follow ups on the IP licenses and calls, however, I didn't see one. Please let me know if I missed something you sent. My understanding was that you were to have a conversation with the engineers in the Netherlands to coordinate. Please let me know when we can expect to receive the updated IP listing and we can schedule the calls the engineers. We really need to get moving on this.

Thanks,  
John

On Aug 6, 2024, at 5:00 PM, Thompson, John (Ptrn-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)> wrote:

Michael:

We'd really like to get started with the very limited diligence we requested of the Trustee and to transition needto negotiations to achieve a consensual path forward as quickly as possible. So we would appreciate the Trustee's responses to/facilitation of the two diligence requests sometime this evening or tomorrow morning, and we are fully available for a call with you anytime tomorrow. If tomorrow afternoon is the soonest that you can do a call, please name the time, and we will set it up and circulate the meeting link.

Thanks,  
John

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

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**From:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Sent:** Tuesday, August 6, 2024 4:44 PM

**To:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>

**Subject:** RE: Stream

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John – we are caught up in a bit of a mess – tomorrow is going to be much better for a call – what is your availability in the afternoon?

**Michael D. Vagnoni**

Partner

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**Sent:** Tuesday, August 6, 2024 1:50 PM

**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; [adam.swick@akerman.com](mailto:adam.swick@akerman.com)

**Subject:** RE: Stream

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Michael:

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Thanks,  
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[Profile](#)



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**From:** Thompson, John (Ptnr-DC)  
**Sent:** Tuesday, August 6, 2024 11:13 AM  
**To:** 'Vagnoni, Michael' <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>  
**Subject:** RE: Stream

Michael:

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Thanks,  
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[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

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**From:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
**Sent:** Tuesday, August 6, 2024 10:45 AM  
**To:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>  
**Subject:** Stream

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---

**From:** Thompson, John (Ptrn-DC)  
**Sent:** Saturday, August 24, 2024 9:47 AM  
**To:** Vagnoni, Michael; George, Edmond  
**Cc:** Swick, Adam (Aus); Saldutti, William; Espinosa, Eduardo (Ptrn-Dal)  
**Subject:** RE: Stream  
**Attachments:** Amended Notice of Rule 7030 Examination Duces Tecum to Trustee.pdf

Michael:

Once again, we have received no response to our correspondence below. While we hoped and expected that you would honor our verbal agreement to make the Trustee available for his deposition before the end of August, it is clear that you are unwilling to work out a schedule consensually. Your continued silence is unfortunate, but we have no choice but to move forward with the discovery to which VSI is entitled in light of the current motions practice and contested matters. Accordingly, attached please find an amended examination notice and associated subpoena setting the Trustee's deposition for September 3, 2024 with documents to be produced by August 30<sup>th</sup>.

We remain available to discuss VSI's offer and the other multiple open matters.

John

**John Thompson**

Partner

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D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

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**From:** Thompson, John (Ptrn-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Sent:** Wednesday, August 21, 2024 3:02 PM  
**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>; George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>  
**Cc:** Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>; Saldutti, William <[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>; Espinosa, Eduardo (Ptrn-Dal) <[eduardo.espinosa@akerman.com](mailto:eduardo.espinosa@akerman.com)>  
**Subject:** Re: Stream

Michael:

It has now been over a week since we communicated our proposal for a plan sponsorship with a \$115 mm restructuring facility and additional \$10 mm DIP. You did not even give us the courtesy of responding, let alone engaging in good faith negotiations. In addition, it has been more than three weeks since our original request for simple, straightforward, and easily facilitated due diligence to permit VSI and its investment partners to properly assess the value of the Stream assets, as they now sit after months of remaining fallow and subject to continued pilferage notwithstanding the Trustee's statutory duties to protect estate value and the interests of all creditors. Finally, it has been over a month since we communicated proof of funds for cash and liquid assets well in excess of the trustee is current stocking horse bid proposal. Notwithstanding all of the foregoing, you and the trustee have remained radio, silent and utterly disengaged.

During our initial conversations, we discussed the postponement and consolidation of our respective motions and organization and timing for associated discovery. You asked that we withdraw the VSI Rule 2004 subpoena for the deposition of the Trustee, and we accommodated that request and noticed the deposition at your request and in the spirit of progress and potential resolution. Thereafter, you explained that the Trustee was not available on August 9

when we noticed his deposition per your request. We agreed that that deposition would take place within the last week of August (this coming week), but consistent with the radio silence outlined above, we have heard nothing from Obermeyer or the Trustee. As such, we are formally requesting that the Trustee make himself available for deposition testimony before the end of month of August. We asked that you respond promptly to this request, or we will have little choice but to approach the Court for appropriate relief.

It is regrettable that the trustee has elected to pursue the path of disengagement and refused to even consider the good faith proposals made by VSI. It is even more disappointing in light of the fact that VSI's offer is clearly superior to what is currently on offer from the Hawk Parties and would undoubtedly yield a better outcome for virtually all stakeholders in this case - particularly unsecured creditors. But as unfortunate as it is, that is the apparent path of the trustee, and it will be his to defend before the Bankruptcy Court.

Please provide us the professional courtesy of a prompt response as we need to get moving on discovery in light of the current motions practices and the Trustee's unwillingness to engage.

Thank you,  
John

On Aug 14, 2024, at 7:02 PM, Thompson, John (Ptrn-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)> wrote:

Michael:

I appreciate that you have been in a hearing all day today, but we communicated our availability for a call on Monday and Tuesday and received no response. We further communicated VSI's term sheet to provide a substantial cash facility and sponsor a plan of reorganization with a renewed request for a time to complete a call and advance the due diligence request - no answer. I don't think it is unreasonable for us to conclude that the Trustee is ignoring and/or slow-walking our reasonable requests. Please advise as to whether and when the Trustee will engage with VSI and when we can have a call. If we do not hear back promptly, we will have to conclude that the Trustee is uninterested in entertaining reasonable proposals and consider VSI's alternatives.

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any, promptly. And just to be clear, you can download a pdf version from DocuSign. It's a button at the top.

Finally, please advise as to when you will be available for the call promised by Michael below.

Thank you,  
John

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**Sent:** Tuesday, August 13, 2024 3:52 PM

**To:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>; Vagnoni, Michael  
<[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Cc:** Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>; Saldutti, William

<[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>; Espinosa, Eduardo (Ptnr-Dal) <[eduardo.espinosa@akerman.com](mailto:eduardo.espinosa@akerman.com)>

**Subject:** RE: Stream

**[External to Akerman]**

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Best

Ed.

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**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Sent:** Monday, August 12, 2024 5:13 PM

**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; [adam.swick@akerman.com](mailto:adam.swick@akerman.com); Saldutti, William  
<[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>; [eduardo.espinosa@akerman.com](mailto:eduardo.espinosa@akerman.com)

**Subject:** RE: Stream

Michael:

If you have not seen it already, you should have received a copy of VSI's term sheet outlining its proposal to serve as plan sponsor to provide a \$115 million facility for the reorganization of the StreamTV debtors (sent via DocuSign from my partner Eduardo Espinosa). We look forward to the Trustee's prompt response as well as a follow up from you regarding a time for tomorrow's call.

Thank you,  
John

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

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**From:** Thompson, John (Ptnr-DC)

**Sent:** Monday, August 12, 2024 12:41 PM

**To:** 'Vagnoni, Michael' <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus)

<[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>; Saldutti, William <[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>; Espinosa, Eduardo (Ptnr-Dal) <[eduardo.espinosa@akerman.com](mailto:eduardo.espinosa@akerman.com)>

**Subject:** RE: Stream

Michael,

We are available this afternoon and all day tomorrow at your convenience. Please let us know what time you can speak.

Yes, we have a copy of the NDA between VSI and the Trustee. We will share confidential information with ULAS only pursuant to Section 2.2 of the NDA. Finally, Continental Advisory Services, LLC will not be receiving confidential information. If such disclosure becomes necessary, we will contact you for your permission to disclose such confidential information in advance.

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John

**John Thompson**

Partner

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D: 202 824 1760 | C: 202 302 0646

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<[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>; Saldutti, William <[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>

**Subject:** RE: Stream

**[External to Akerman]**

We are working on your requests and setting up a meeting with the engineers in the Netherlands. Please let me know your availability this week. I have limited availability tomorrow and an all-day hearing on Wednesday, but Thursday and Friday are generally free.

Do you have a copy of the NDA between VSI and the Trustee? We are also going to need an NDA with ULAS. The expression of interest you sent also mentions a family office called Continental Advisory

Services, LLC – are you aware if that company will be receiving the diligence as well – if so, we will need an NDA for them as well.

Michael

**Michael D. Vagnoni**

Partner

**Obermayer Rebmann Maxwell & Hippel LLP**

Centre Square West

1500 Market Street | Suite 3400

Philadelphia, PA 19102-2101

215.665.3066 tel | 215.665.3165 fax

[michael.vagnoni@obermayer.com](mailto:michael.vagnoni@obermayer.com) | [www.obermayer.com](http://www.obermayer.com)

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**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Sent:** Friday, August 9, 2024 10:59 AM

**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; [adam.swick@akerman.com](mailto:adam.swick@akerman.com)

**Subject:** Re: Stream

Michael,

I was looking for your email from yesterday afternoon regarding the due diligence follow ups on the IP licenses and calls, however, I didn't see one. Please let me know if I missed something you sent. My understanding was that you were to have a conversation with the engineers in the Netherlands to

coordinate. Please let me know when we can expect to receive the updated IP listing and we can schedule the calls the engineers. We really need to get moving on this.

Thanks,  
John

On Aug 6, 2024, at 5:00 PM, Thompson, John (Ptnr-DC)  
<[john.thompson@akerman.com](mailto:john.thompson@akerman.com)> wrote:

Michael:

We'd really like to get started with the very limited diligence we requested of the Trustee and to transition needto negotiations to achieve a consensual path forward as quickly as possible. So we would appreciate the Trustee's responses to/facilitation of the two diligence requests sometime this evening or tomorrow morning, and we are fully available for a call with you anytime tomorrow. If tomorrow afternoon is the soonest that you can do a call, please name the time, and we will set it up and circulate the meeting link.

Thanks,  
John

**John Thompson**

Partner

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**Sent:** Tuesday, August 6, 2024 4:44 PM

**To:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus)  
<[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>

**Subject:** RE: Stream

**[External to Akerman]**

John – we are caught up in a bit of a mess – tomorrow is going to be much better for a call – what is your availability in the afternoon?

**Michael D. Vagnoni**

Partner

**Obermayer Rebmann Maxwell & Hippel LLP**

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215.665.3066 tel | 215.665.3165 fax

[michael.vagnoni@obermayer.com](mailto:michael.vagnoni@obermayer.com) | [www.obermayer.com](http://www.obermayer.com)

---

**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Sent:** Tuesday, August 6, 2024 1:50 PM

**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; [adam.swick@akerman.com](mailto:adam.swick@akerman.com)

**Subject:** RE: Stream

**WARNING:** This email originated from an external sender. Exercise caution before clicking links or opening attachments. When in doubt, contact the IT department.

Michael:

Just confirming that you received this and that we can speak this afternoon. We are available now and through the rest of the day.

Thanks,  
JT

**John Thompson**

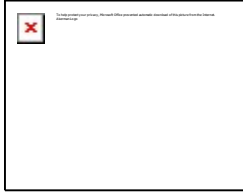
Partner

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Profile



CONFIDENTIALITY NOTE: The information contained in this transmission may be privileged and confidential, and is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

---

**From:** Thompson, John (Ptnr-DC)  
**Sent:** Tuesday, August 6, 2024 11:13 AM  
**To:** 'Vagnoni, Michael' <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>  
**Subject:** RE: Stream

Michael:

Thanks for your email. Yes, we have a number of items to address, so a call this afternoon would be very helpful. We are available anytime between 1 pm - 5 pm ET. Let us know what works for you, and we will circulate a meeting invite and link.

Thanks,  
JT

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

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**From:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
**Sent:** Tuesday, August 6, 2024 10:45 AM  
**To:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>  
**Subject:** Stream

**[External to Akerman]**

John: I got your voice mail from yesterday afternoon – I am in the middle of a hearing. Is there anything specific you need to discuss or a specific time that is good for a call this afternoon? Michael



**Michael D. Vagnoni**

Partner

**Obermayer Rebmann Maxwell & Hippel LLP**

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[michael.vagnoni@obermayer.com](mailto:michael.vagnoni@obermayer.com) | [www.obermayer.com](http://www.obermayer.com)

---

**From:** Swick, Adam (Aus)  
**Sent:** Saturday, August 24, 2024 3:13 PM  
**To:** Thompson, John (Ptnr-DC); Vagnoni, Michael; George, Edmond  
**Cc:** Saldutti, William; Espinosa, Eduardo (Ptnr-Dal)  
**Subject:** RE: Stream

Michael,

We need to seek documents and a depo from SSG. Please let us know if you have the contact information for SSG's counsel. If not, we'll subpoena them directly early next week.

Regards,

**R. Adam Swick**

Special Counsel  
Akerman LLP | 500 West 5th Street, Suite 1210 | Austin, TX 78701  
D: 737 999 7103  
[adam.swick@akerman.com](mailto:adam.swick@akerman.com)

---

**From:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Sent:** Saturday, August 24, 2024 9:47 AM  
**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>; George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>  
**Cc:** Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>; Saldutti, William <[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>; Espinosa, Eduardo (Ptnr-Dal) <[eduardo.espinosa@akerman.com](mailto:eduardo.espinosa@akerman.com)>  
**Subject:** RE: Stream

Michael:

Once again, we have received no response to our correspondence below. While we hoped and expected that you would honor our verbal agreement to make the Trustee available for his deposition before the end of August, it is clear that you are unwilling to work out a schedule consensually. Your continued silence is unfortunate, but we have no choice but to move forward with the discovery to which VSI is entitled in light of the current motions practice and contested matters. Accordingly, attached please find an amended examination notice and associated subpoena setting the Trustee's deposition for September 3, 2024 with documents to be produced by August 30<sup>th</sup>.

We remain available to discuss VSI's offer and the other multiple open matters.

John

**John Thompson**

Partner  
Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001  
D: 202 824 1760 | C: 202 302 0646  
[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

---

**From:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Sent:** Wednesday, August 21, 2024 3:02 PM

**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>; George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>  
**Cc:** Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>; Saldutti, William <[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>; Espinosa, Eduardo (Ptrn-Dal) <[eduardo.espinosa@akerman.com](mailto:eduardo.espinosa@akerman.com)>  
**Subject:** Re: Stream

Michael:

It has now been over a week since we communicated our proposal for a plan sponsorship with a \$115 mm restructuring facility and additional \$10 mm DIP. You did not even give us the courtesy of responding, let alone engaging in good faith negotiations. In addition, it has been more than three weeks since our original request for simple, straightforward, and easily facilitated due diligence to permit VSI and its investment partners to properly assess the value of the Stream assets, as they now sit after months of remaining fallow and subject to continued pilferage notwithstanding the Trustee's statutory duties to protect estate value and the interests of all creditors. Finally, it has been over a month since we communicated proof of funds for cash and liquid assets well in excess of the trustee is current stocking horse bid proposal. Notwithstanding all of the foregoing, you and the trustee have remained radio, silent and utterly disengaged.

During our initial conversations, we discussed the postponement and consolidation of our respective motions and organization and timing for associated discovery. You asked that we withdraw the VSI Rule 2004 subpoena for the deposition of the Trustee, and we accommodated that request and noticed the deposition at your request and in the spirit of progress and potential resolution. Thereafter, you explained that the Trustee was not available on August 9 when we noticed his deposition per your request. We agreed that that deposition would take place within the last week of August (this coming week), but consistent with the radio silence outlined above, we have heard nothing from Obermeyer or the Trustee. As such, we are formally requesting that the Trustee make himself available for deposition testimony before the end of month of August. We asked that you respond promptly to this request, or we will have little choice but to approach the Court for appropriate relief.

It is regrettable that the trustee has elected to pursue the path of disengagement and refused to even consider the good faith proposals made by VSI. It is even more disappointing in light of the fact that VSI's offer is clearly superior to what is currently on offer from the Hawk Parties and would undoubtedly yield a better outcome for virtually all stakeholders in this case - particularly unsecured creditors. But as unfortunate as it is, that is the apparent path of the trustee, and it will be his to defend before the Bankruptcy Court.

Please provide us the professional courtesy of a prompt response as we need to get moving on discovery in light of the current motions practices and the Trustee's unwillingness to engage.

Thank you,  
John

On Aug 14, 2024, at 7:02 PM, Thompson, John (Ptrn-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)> wrote:

Michael:

I appreciate that you have been in a hearing all day today, but we communicated our availability for a call on Monday and Tuesday and received no response. We further communicated VSI's term sheet to provide a substantial cash facility and sponsor a plan of reorganization with a renewed request for a time do complete a call and advance the due diligence request - no answer. I don't think it is unreasonable for us to conclude that the Trustee is ignoring and/or slow-walking our reasonable requests. Please advise as to whether and when the Trustee will engage with VSI and when we can have a call. If we do not hear back promptly, we will have to conclude that the Trustee is uninterested in entertaining reasonable proposals and consider VSI's alternatives.

Thank you,

John

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

On Aug 13, 2024, at 5:12 PM, Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)> wrote:

Ed:

As we have made clear in multiple communications, we are working diligently to provide the Trustee with an actionable proposal that is unequivocally better than what is currently on the table from Hawk/SLS/SCI and time is of the essence. So, as Michael requested during our call on Aug. 7, our Client provided the Trustee with a formal offer. I'm sure you didn't mean to suggest that you wouldn't entertain a superior offer merely because you don't like the file format in which it was delivered. The content of the offer is the same in Word and PDF. In the interest of expediency, attached is a Word version of the offer. We are prepared to entertain reasonable modifications. Please provide them, if any, promptly. And just to be clear, you can download a pdf version from DocuSign. It's a button at the top.

Finally, please advise as to when you will be available for the call promised by Michael below.

Thank you,  
John

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**From:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>

**Sent:** Tuesday, August 13, 2024 3:52 PM

**To:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>; Vagnoni, Michael

<[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Cc:** Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>; Saldutti, William

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**Subject:** RE: Stream

**[External to Akerman]**

John, we got a term sheet by DocuSign. The Trustee isn't signing anything until he can digest the terms of this proposal, and determine if it presents something better than what is on the table. So we are clear, we are not reviewing a DocuSign document. Please send a word version of this Document as we don't want any confusion about what is happening here. If you want proof we received it, send it with a return receipt. Not sure why you used DocuSign.

Best

Ed.

---

**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Sent:** Monday, August 12, 2024 5:13 PM  
**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; [adam.swick@akerman.com](mailto:adam.swick@akerman.com); Saldutti, William <[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>; [eduardo.espinosa@akerman.com](mailto:eduardo.espinosa@akerman.com)  
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**Subject:** RE: Stream

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Michael

**Michael D. Vagnoni**

Partner

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**Sent:** Friday, August 9, 2024 10:59 AM  
**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>  
**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; [adam.swick@akerman.com](mailto:adam.swick@akerman.com)  
**Subject:** Re: Stream

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Thanks,  
John

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<[john.thompson@akerman.com](mailto:john.thompson@akerman.com)> wrote:

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**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>  
**Subject:** RE: Stream

**[External to Akerman]**

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**Michael D. Vagnoni**

Partner

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[michael.vagnoni@obermayer.com](mailto:michael.vagnoni@obermayer.com) | [www.obermayer.com](http://www.obermayer.com)

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**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Sent:** Tuesday, August 6, 2024 1:50 PM



To: Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

Cc: George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; [adam.swick@akerman.com](mailto:adam.swick@akerman.com)

Subject: RE: Stream

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Michael:

Just confirming that you received this and that we can speak this afternoon. We are available now and through the rest of the day.

Thanks,  
JT

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

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**From:** Thompson, John (Ptnr-DC)

**Sent:** Tuesday, August 6, 2024 11:13 AM

**To:** 'Vagnoni, Michael' <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>

**Subject:** RE: Stream

Michael:

Thanks for your email. Yes, we have a number of items to address, so a call this afternoon would be very helpful. We are available anytime between 1 pm - 5 pm ET. Let us know what works for you, and we will circulate a meeting invite and link.

Thanks,  
JT

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

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**From:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>

**Sent:** Tuesday, August 6, 2024 10:45 AM

**To:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Cc:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>

**Subject:** Stream

**[External to Akerman]**

John: I got your voice mail from yesterday afternoon – I am in the middle of a hearing. Is there anything specific you need to discuss or a specific time that is good for a call this afternoon? Michael

**Michael D. Vagnoni**

Partner

**Obermayer Rebmann Maxwell & Hippel LLP**

Centre Square West

1500 Market Street | Suite 3400

Philadelphia, PA 19102-2101

215.665.3066 tel | 215.665.3165 fax

[michael.vagnoni@obermayer.com](mailto:michael.vagnoni@obermayer.com) | [www.obermayer.com](http://www.obermayer.com)



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**From:** Thompson, John (Ptrn-DC)  
**Sent:** Monday, August 26, 2024 1:15 PM  
**To:** George, Edmond  
**Cc:** Vagnoni, Michael; J Scott Victor; Swick, Adam (Aus); Dupre, Andrew (Ptrn-WLM)  
**Subject:** RE: SSG deposition

Ed:

I must ask for your indulgence here, as I am confused by your email below. I do not understand how providing a \$170 million proof of funds and an all cash offer well-over \$100 million is an effort to delay and drive-up fees. I also don't understand how asking for diligence items the Trustee previously agreed to provide and confer about is an effort to delay and drive-up fees. Finally, I fail to understand how follow-up correspondence with respect to discovery on pending motions practice is an effort to delay and drive-up fees.

If SSG can produce documents on Friday (August 30<sup>th</sup>) pursuant to a request we can deliver tomorrow, we can take SSG's deposition on Wednesday next week (September 3<sup>rd</sup>), the day after we will take the Trustee's deposition on Tuesday (September 2<sup>nd</sup>). Can you please confirm that the Trustee will produce documents by Friday (August 30<sup>th</sup>) and we can take his deposition next Tuesday? If your email below is communicating that the Trustee is not going to produce any documents or appear for a deposition, we need to know immediately.

Thank you,  
John

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

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**From:** George, Edmond <Edmond.George@obermayer.com>  
**Sent:** Monday, August 26, 2024 1:02 PM  
**To:** Thompson, John (Ptrn-DC) <john.thompson@akerman.com>  
**Cc:** Vagnoni, Michael <Michael.vagnoni@obermayer.com>; J Scott Victor <jsvictor@ssgca.com>  
**Subject:** RE: SSG deposition

**[External to Akerman]**

I need dates from you for deposition so that we can have the SSG hearing without delay. I am not responding to those other issues you raise, which have nothing to do with the SSG application, but are part of your and your client's efforts to delay and drive-up fees.

What dates do you have to depose Scott? If you don't provide dates, we will assume you don't want his deposition, are abandoning the Subpoena, and we will do the hearing without it. I have to be there and I have a busy trial schedule; that's why we need the dates. We are not delaying any scheduled hearing on your objections.

I am talking to SSG this afternoon about their counsel choices. I'd like dates by then.

---

**From:** [john.thompson@akerman.com](mailto:john.thompson@akerman.com) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>

**Sent:** Monday, August 26, 2024 12:46 PM

**To:** Vagnoni, Michael <[Michael.vagnoni@obermayer.com](mailto:Michael.vagnoni@obermayer.com)>; George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>; Saldutti, William <[william.saldutti@obermayer.com](mailto:william.saldutti@obermayer.com)>

**Cc:** [adam.swick@akerman.com](mailto:adam.swick@akerman.com); [eduardo.espinosa@akerman.com](mailto:eduardo.espinosa@akerman.com); [andrew.dupre@akerman.com](mailto:andrew.dupre@akerman.com)

**Subject:** RE: SSG deposition

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Ed:

It is clear from your email to Adam below that you and Michael are receiving our emails regarding discovery, due diligence, and VSI's good faith offer in proposal (attached again for your convenience), but for some reason you and the Trustee refuse to respond. Now, it seems that you are willing to respond to my partner (but not me) with respect to the availability of a witness you do not represent on an accelerated schedule without accounting for document production or the as yet unscheduled hearing to retain SSG as investment banker. Frankly, this is getting old and I am becoming frustrated. I am doing everything possible to operate in a open, professional, and courteous manner to be productive in this matter, only to be ignored by the Trustee and his counsel. Surely, we can achieve better.

In any event, let's address first things first. We have outstanding requests to you to (i) produce documents relevant to the open motions practice and (ii) set the Trustee's deposition in connection with that same motions practice (now including the retention of SSG as investment banker). Please first advise as to whether the Trustee will (i) produce documents on or before Friday, August 30, 2024 in response to our requests and (ii) sit for his deposition on September 3, 2024 per our latest notice delivered over the weekend. In addition, please advise us of the date that the Trustee is seeking and able to obtain from the chambers for the hearing regarding the engagement of SSG as investment banker. Finally, if you know, please share the name of SSG's counsel or the identity of SSG's representative (if not yet represented), so that we may coordinate the production of documents in advance of the deposition. And please feel free to advise as to when you, the SSG representative, and his counsel (if retained) will be available for the SSG representative's deposition.

We would greatly appreciate the courtesy of a timely response.

Thank you,  
John

**John Thompson**

Partner

Akerman LLP | 750 Ninth Street, N.W., Suite 750 | Washington, D.C. 20001

D: 202 824 1760 | C: 202 302 0646

[john.thompson@akerman.com](mailto:john.thompson@akerman.com)

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**From:** Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>  
**Sent:** Monday, August 26, 2024 10:14 AM  
**To:** Thompson, John (Ptnr-DC) <[john.thompson@akerman.com](mailto:john.thompson@akerman.com)>  
**Cc:** 'mathu rajan' <[mathu.rajan@visualesemi.com](mailto:mathu.rajan@visualesemi.com)>  
**Subject:** FW: SSG deposition

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**From:** George, Edmond <[Edmond.George@obermayer.com](mailto:Edmond.George@obermayer.com)>  
**Sent:** Monday, August 26, 2024 9:12 AM  
**To:** Swick, Adam (Aus) <[adam.swick@akerman.com](mailto:adam.swick@akerman.com)>  
**Subject:** SSG deposition

**[External to Akerman]**

Adam, we forwarded your request to SSG. What day this week other than Wednesday could you do his deposition? They are deciding on counsel. Would you be willing to do it by Zoom?

Best,

Ed.



**Edmond M. George, Esquire, LLM**

Chairman, Creditor's Rights and Financial Reorganization Group

**Obermayer Rebmann Maxwell & Hippel LLP**

Centre Square West

1500 Market Street | Suite 3400

Philadelphia, PA 19102-2101

215.665-3140 tel | 215.665.3165 fax

[edmond.george@obermayer.com](mailto:edmond.george@obermayer.com) | [www.obermayer.com](http://www.obermayer.com)

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